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August 4, 2020

Via ECF

Hon. Cheryl L. Pollak
United States District Court Judge
Eastern District of New York
United States Courthouse
225 Cadman Plaza E.
Brooklyn, NY 11201

Re: Motion to stay discovery

Case Name: SHEEHAN V. CONSENSYS, INC.

Case No. 19-cv-04154 (DLI)(CLP)

Dear Judge Pollak,

I represent the Plaintiff in the above referenced matter. I am writing the Court to request a second stay of discovery. I have conferred with opposing counsel who consents to a 45 day stay. However, for the following reasons, I am sure 45 days is insufficient.

Two weeks ago, I was notified by Plaintiff Sheehan's girlfriend that he went into cardiac arrest at his home. She managed to keep him alive by administering CPR, until paramedics arrived. The paramedics were able to sustain Mr. Sheehan until he was placed on life support when he arrived at the hospital. Since his cardiac arrest, Mr. Sheehan has been in a coma. Last Friday, he was stepped down out of the ICU, but remains on life support, in a coma. His status is improving, but they do not know the cause of the incident, the extent of the damage, or his path to recovery.

Accordingly, Mr. Sheehan cannot sit for a deposition or prosecute his claim at this time. If the Court can grant an open-ended stay of discovery, I will update the Court as Mr. Sheehan's status changes. But at minimum I will provide an update by September 1, 2020.

Thank you for your time and consideration of this request.

Respectfully Submitted,

By: _____

Jordan El-Hag, Esq.